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Counsel for the State of Connecticut

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

PROSPECT MEDICAL HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-80002 (SGJ)

(Jointly Administered)

**STIPULATION AND AGREED ORDER BY AND AMONG
THE DEBTORS AND THE STATE OF CONNECTICUT EXTENDING
TIME TO OBJECT TO DISCHARGEABILITY**

This stipulation and agreed order (this “Stipulation”) is entered into this April 20, 2025, by and among the above-captioned debtors and debtors in possession (collectively, the “Debtors”) and the State of Connecticut (“Connecticut” and together with the Debtors, the “Parties”). The Parties hereby stipulate and agree as follows:

WHEREAS, on January 11, 2025, the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Northern District of Texas (the “Court”);

WHEREAS, section 1141(d)(6) of the Bankruptcy Code, provides that “the confirmation of a plan does not discharge a debtor that is a corporation from any debt . . . of a kind specified in paragraph (2)(A) or (2)(B) of section 523(a) that is owed to a domestic governmental unit.” 11 U.S.C. § 1141(d)(6)(A); and

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/Prospect>. The Debtors’ mailing address is 3824 Hughes Ave., Culver City, CA 90232.

WHEREAS, out of an abundance of caution, to the extent that the filing of a nondischargeability complaint may be necessary, Connecticut, by this proposed Stipulation, seeks an extension of any deadline that it may, as a Governmental Unit (as defined in section 101(27) of the Bankruptcy Code), be subject to, to commence a judicial proceeding to determine the dischargeability of any its potential claims under section 1141(d)(6) of the Bankruptcy Code.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES, AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS ORDERED AS FOLLOWS:

1. The above recitals are fully incorporated herein and made an express part of this Stipulation.
2. The deadline, if any, by which Connecticut must commence a judicial proceeding to determine the dischargeability of a claim under section 1141(d)(6) of the Bankruptcy Code is hereby extended through and including May 27, 2025, subject to further extension by agreement of the Parties or order of the Court.
3. Nothing in this Stipulation constitutes a determination that section 523(c) of the Bankruptcy Code and/or Rule 4007 of the Federal Rules of Bankruptcy Procedure applies, or that any deadline exists, to seek a determination of dischargeability under section 1141(d)(6) of the Bankruptcy Code. Nothing in this Stipulation constitutes a determination on whether section 1141(d)(6) is self-executing, and all rights are reserved in that regard. This Stipulation is limited solely to the extension of the deadline, if any, to commence a judicial proceeding to determine the dischargeability of a claim under section 1141(d)(6), and all Parties' rights are reserved as to whether any such deadline applies to Connecticut.
4. The terms and conditions of this Stipulation will be immediately effective and enforceable upon its entry.

5. This Stipulation may be signed in counterparts (including, without limitation, by PDF, facsimile or electronic transmission) each of which will be deemed an original and all of which will be taken together and deemed one instrument.

6. This Stipulation shall constitute the entire agreement between the Parties hereto regarding the matters addressed herein. No extrinsic or parol evidence may be used to vary any of the terms herein. All representations, warranties, inducements, and/or statements of intention made by the Parties are embodied in this Stipulation, and no party hereto relied upon, shall be bound by, or shall be liable for any alleged representation, warranty, inducement, or statement of intention that is not expressly set forth in this Stipulation.

7. This Stipulation is subject to the approval of the Bankruptcy Court. In the event that the Bankruptcy Court declines to approve this Stipulation, it shall be null and void, with no force or effect.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation.

END OF ORDER

Dated: April 20, 2025
Dallas, Texas

/s/ Thomas R. Califano

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Counsel for the State of Connecticut

Certificate of Service

I certify that on April 20, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Thomas R. Califano
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